

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**DECLARATION OF ANDREW R.  
KAUFMAN IN SUPPORT OF  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL**

I, Andrew R. Kaufman, declare:

1. I am an attorney in the law firm of Girard Sharp, LLP. I am a member of the State Bars of Wisconsin and New York, and am admitted to practice pro hac vice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this declaration in support of Plaintiffs' Administrative to File Under Seal plaintiff-specific personal information, as well plaintiff-specific disclosures regarding incidents of sexual assaults. As set forth in the accompanying motion, the information at issue is highly personal, privileged, sensitive information, which meets the "good cause" and the "compelling reasons" standards for sealing. *See In re Uber Technologies, Inc., Passenger Sexual Assault Litigation*, 2024 WL 4211179, at \*1 (N.D. Cal. Sept. 3, 2024) (noting that "documents filed with discovery motions that are no more than tangentially related to the merits of a case may be maintained under seal on a showing of good cause, as distinct from the more stringent standard of compelling reasons to seal documents filed in contexts more closely tied to the merits") (quotations and citations omitted).

3. Here, the information meets the heightened requirements for protection because it includes identifying information about the rider, and specific statements and information about a reported incident of sexual assault, including the specific nature of the assault; the circumstances leading up, surrounding, and in the immediate aftermath of the assault; and information regarding medical and law enforcement interventions.

4. Accordingly, Plaintiffs move to seal the below:

Document	Description	Designating Party
Exhibit 1	Uber-produced document bates stamped UBER-MDL3084-DFS00002727	Plaintiffs (and Uber) <sup>1</sup>

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2025 in Milwaukee, Wisconsin.

/s/ Andrew R. Kaufman  
Andrew R. Kaufman

<sup>1</sup> Because Exhibit 1 was designed by Uber as “Confidential” pursuant to the protective order, pursuant to Local Rule 79-59(f), plaintiffs have also filed an Administrative Motion to Consider Whether Another’s Party’s Materials Should be Sealed.